

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

United States of America,

Plaintiff(s),

Motion To Enlarge Time Pursuant To Rule 6(b)
Criminal Case No.: **16-00797**

v

The deadline for Mr. Gomez to serve and file
his brief is extended to July 21, 2020.
SO ORDERED.

Dated: July 7, 2020

Jerome Gomez,

Petitioner.

LORETTA A. PRESKA, U.S.D.J.

MOTION FOR ENLARGEMENT OF TIME PURSUANT TO
FEDERAL RULE 6(b) RELIEF SOUGHT

NOW COMES, Jerome Gomez, (Hereinafter, "Petitioner"), the sole petitioner in the above caption action respectfully moves this Honorable Court ex parte, pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedures, for an order enlarging the time in which Petitioner may serve and file his brief to the Plaintiff's position in this matter to and including July 14, 2020; which is a date twenty-one (25) days after the service of this motions deposit date from the address listed on the Certificate of Service.

GROUNDS FOR RELIEF

Petitioner is seeking by this motion to preserve the time he would have had to file an initial brief of this action, had his counsel responded to Petitioner's request for documents that pertain to the relevance of Petitioner's current action.

Additionally, Petitioner addresses that the facility has been on lockdown on several occasions in the past few weeks due to 1) the Coronavirus pandemic; 2) shortage of staff; 3) several medical issues that happened in this institution; and the delay in mail; due to a shortage of institution staff.

Further, Petitioner reiterates that he has very limited access to law materials, typewriters (1 with a population of over 450), and law computers (2); due to the overwhelming attention that is being given to the law library in the wake of several recent laws and decisions, i.e., First Step Act, Davis v United States (2019), and a host of other United States Supreme Court decisions.

SUPPORTING MATERIALS

This motion is based on Federal Rules of Civil Procedures Rule 6(b), and on the facts set forth in the accompanying Affidavit of Petitioner, and the pleadings and papers filed in this action.

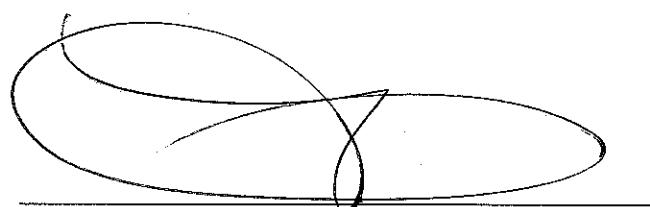
CONCLUSION

For the reasons stated above, Petitioner respectfully moves that this Honorable Court grant the instant motion for Extension of Time (Enlargement of Time) to respond to the plaintiff's brief.

CERTIFICATE OF SERVICE

I declare, verify, state or swear that the foregoing is true and correct that this motion for Enlargement of Time was placed in the United States Postal Service' possession on or before the last day of filing. This motion is going to the following parties: this Honorable Court, the Court Clerk's Office and the United States Attorney's Office.

DATED: June 19, 2020

A handwritten signature in black ink, appearing to read "Jerome Gomez", is written over a horizontal line. The signature is fluid and cursive, with a large, stylized 'J' at the beginning.

Jerome Gomez, Petitioner
Sworn to as true and correct under the
penalties of perjury pursuant to 28 U.S.C.
Section 1746.

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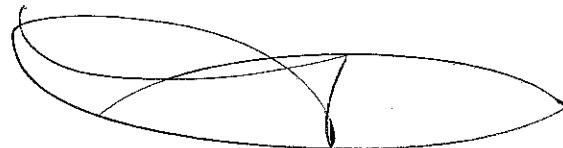
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Jerome Gomez, Petitioner
Sworn to as true and correct under the
penalties of perjury pursuant to 28 U.S.C.
Section 1746.

Fait Accomplis Legal Services
3319 Greenfield Road, #355
Dearborn, MI 48120-1212

2020 JUL - 2

CLEARED
JUL 2 2020
CLERK'S OFFICE

USM
SDNY
40

United States District Court
S^t Court Clerk's Office
40 Foley Square
New York, NY 10007

RECEIVED
JULY 2 2020
CLERK'S OFFICE
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
NEW YORK, NY 10007

